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Attorneys for Defendant and Counterclaim
Plaintiff SOPHOS INC. and Counterclaim
Plaintiff SOPHOS LTD.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

FORTINET, INC., a corporation

Plaintiff,

vs.

SOPHOS, INC., a corporation, MICHAEL
VALENTINE, an individual, and JASON
CLARK, an individual.

Defendants.

SOPHOS INC. and SOPHOS LTD.,
corporations,

Counterclaim Plaintiffs,

vs.

FORTINET, INC., a corporation,

Counterclaim Defendant.

Case No. 3:13-cv-05831-EMC

**NOTICE OF SETTLEMENT AND
STIPULATED REQUEST TO STAY
REMAINING PRETRIAL DEADLINES ; ORDER**

Judge: Honorable Edward M. Chen

Trial Date: 1/19/2016

1 NOTICE IS HEREBY GIVEN that on Monday, November 30, 2015, Plaintiff and
2 Counterclaim Defendant Fortinet, Inc., Defendants and Counterclaim Plaintiffs Sophos, Inc. and
3 Sophos Ltd., and Defendants Michael Valentine and Jason Clark (collectively the “Parties”),
4 completed confidential private mediation, and the Parties have signed a Binding Term Sheet to settle
5 all litigation between the Parties. The Parties have further agreed that the mediator, the Hon. Edward
6 A. Infante (Ret.), has jurisdiction to resolve all disputes that may arise under the Binding Term Sheet.
7 The Parties further anticipate the filing of a stipulated dismissal of all claims within the next 16 days.

8 Accordingly, the Parties request that the Court order that all deadlines in the case be stayed by
9 16 days, until December 16, 2015, while the Binding Term Sheet is reduced to a definitive agreement.
10 This period (16 days from the Binding Term Sheet) is necessary due to the varied and numerous
11 claims and counterclaims, as well as the concurrent litigation in another judicial district (*Sophos Ltd.,*
12 *et al v. Fortinet, Inc.*, 1:14-cv-100-GMS (D. Del. 2014)), and the concurrent arbitration before JAMS,
13 both of which are also being resolved.

14 IT IS SO STIPULATED.
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1 DATED: December 1, 2015

QUINN EMANUEL URQUHART &
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3 By /s/ John M. Neukom

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Attorneys for Plaintiff FORTINET, INC.

9 DATED: December 1, 2015

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Attorneys for Defendant and Counterclaim
Plaintiff SOPHOS INC. and Counterclaim
Plaintiff SOPHOS LTD.

18 **SIGNATURE ATTESTATION**

19 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing
20 of this document has been obtained from John M. Neukom and Sean C. Cunningham.
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22 /s/ Michael F. LaFond

23 Michael F. LaFond
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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The deadline for pretrial filings is extended to 12/22/15. The Pretrial Conference is rescheduled from 12/22/15 to 1/5/16 at 1:30 p.m.

2 **Dated:** 12/1/15

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4 **Hon. Edward M. Chen**

5 **United States**

Judge

